Case 1:21-cr-00128-JGK Document 18 Filed 07/20/21 Page 1 of 1

Case 1:21-cr-00128-JGK Document 17 Filed 07/19/21 Page 1 of 1



William J. Harrington +1 212 459 7140 WHarrington@goodwinlaw.com Goodwin Procter LLP The New York Times Building 620 Eighth Avenue New York, NY 10018

goodwinlaw.com +1 212 813 8800

July 17, 2021

The Honorable John G. Koeltl United States District Judge Southern District of New York 500 Pearl Street New York, NY 10007

APPLICATION GRANTED SO ORDERED

John G. Koeltl, U.S.D.J.

Re:

United States v. Anthony Hamilton, 21 Cr. 128 (JGK)

Dear Judge Koeltl:

I represent Anthony Hamilton in the above referenced matter. I write to request that the Court modify Mr. Hamilton's bail terms to include stand-alone GPS monitoring, instead of his current GPSenforced 10:00pm curfew, so that he may take a new job working overnight. AUSA Thomas Burnett has told me that the Government does not object to this modification of Mr. Hamilton's bail terms.

By way of background, Mr. Hamilton's terms of release were set on January 12, 2021 by Magistrate Judge Ona T. Wang. Of particular relevance to this request, Mr. Hamilton's release terms imposed a curfew, but directed that it be consistent with Mr. Hamilton's continued employment. Pretrial Services Officer Bernisa Mejia has informed me that Mr. Hamilton recently secured employment at a shelter which requires him to work overnight shifts in the Bronx, NY, and that Mr. Hamilton will therefore need modified release terms in order to take this job.

Respectfully submitted,

/s/ William J. Harrington

William J. Harrington

Cc:

AUSA Thomas Burnett

Pretrial Services Officer Bernisa Mejia

USDS SDNY DOCUMENT ELECTRONICALLY FILED

DOC #: